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June 14, 2024

VIA ECF

Honorable Natasha C. Merle
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

**RE: Barrett v. The Department of Education of the City of New York
24-cv-00574 (NCM) (RML)**

Dear Judge Merle:

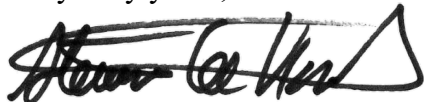
Plaintiff is writing this letter for a brief extension of time to respond to the premotion letter filed on June 11, 2024, thus Plaintiff's response is due on June 18, 2024. Plaintiff is requesting **June 21, 2024**, to file her response. This is the first request for an extension by Plaintiff in connection with this premotion letter and this extension will not impact any other deadlines. Defense counsel has graciously *consented* to this extension.

The reason for the extension is that Plaintiff's counsel has two ongoing tenured teacher 3020-a trials (NYCDOE v. Sherman and Westbury UFSD v. Abruscato) and thus have been on an administrative trial on Tuesday and Wednesday and also has had several statutory deadlines that cannot be moved.

Thus, it is respectfully submitted that is this very brief extension of three days is reasonable and will not result in any significant delay.

Thank you for your consideration in this matter.

Very truly yours,



STEWART LEE KARLIN
SLK/cb

cc: Kathleen Linnane , ACC via ECF